

Chan, Janice

From: Robert Phalen <rphalen@hickmanseggs.com>
Sent: Thursday, September 22, 2016 1:29 PM
To: Chan, Janice; Shari Yeatts
Subject: RE: EPA follow up to 114 Request

Janice,

Not a problem.

We will PDF and e-mail you our responses and certification statement on Friday October 7th, and the Hard-Copy will be mailed to your attention.

I look forward to speaking with you again on the 3rd.

-Rp

Robert Phalen
Hickman's Family Farms
Environmental Program Manager
rphalen@hickmanseggs.com
623-300-5630 (Cell)

From: Chan, Janice [mailto:Chan.Janice@epa.gov]
Sent: Thursday, September 22, 2016 1:17 PM
To: Shari Yeatts
Cc: Robert Phalen
Subject: RE: EPA follow up to 114 Request

Hi Shari and Robert:

Robert, thank you for calling me earlier today. Upon considering receiving responses to my follow-up inquiry by email and by hard copy, I would like to receive the responses by both email and hard copy rather than just email if still possible. In our original 114 letter, we had included a copy of the Statement of Certification. Please include that in your response(s).

I look forward to speaking with you on October 3 to discuss any questions regarding my questions.

Thank you,
Janice

From: Shari Yeatts [mailto:syeatts@hickmanseggs.com]
Sent: Friday, September 16, 2016 3:40 PM
To: Chan, Janice <Chan.Janice@epa.gov>
Cc: Robert Phalen <rphalen@hickmanseggs.com>
Subject: RE: EPA follow up to 114 Request

Hi Janice,

Robert is traveling back from one of our other facilities today. We will review this request first thing Monday morning and get back with you regarding scheduling a call the early part of next week.

Have a wonderful weekend,

Shari Yeatts

From: Chan, Janice [<mailto:Chan.Janice@epa.gov>]

Sent: Friday, September 16, 2016 3:35 PM

To: Shari Yeatts <syeatts@hickmanseggs.com>; Robert Phalen <rphalen@hickmanseggs.com>

Subject: EPA follow up to 114 Request

Dear Ms. Yeatts and Mr. Phalen,

Thank you for your responses to EPA's June 1, 2016 Request for Information under Section 114 of the Clean Air Act (114 Request) to Hickman's Egg Ranch, Inc. (hereinafter "Hickman" or "you"). We have some questions to follow-up and clarify the answers you provided. I would be happy to discuss these questions with you on a conference call. To facilitate your response, the questions below are presented in the same order as the questions in our original 114 Request.

1. **This question pertains to Request 1.** Clarify the identities of all the process streams for feed, waste water, dust control, air flow, and other processes applicable to the raising of poultry, processing of eggs, and manufacturing and processing of compost and fertilizer.
2. These questions are for Request 2.
 - a. **Responses to 2.b. and 2.c.** Your responses used the language "date construction began" and "birds first installed". Does this language correspond to when the construction of each facility commenced (per Request 2.b.) and when the construction was completed (per Request 2.c.)?
 - b. **Responses to 2.e.** we asked for information regarding the design capacity of each facility in terms of maximum number of poultry. For 2.f., we asked for the maximum number of poultry actually housed at any time since the construction through May 31, 2016. In document DOC # 0008, does the column labeled "MAX # of HENS PER House EVER Housed" reflect the maximum number of poultry based on the design capacity per Request 2.e, or does that column respond to the actual number birds housed per Request 2.f.? Is each facility designed to house more poultry than indicated in DOC # 0008?
 - c. **Responses to 2.h.** We asked for engineering designs or calculations used for air flow rates or volumes. The responsive document DOC # 0009 does not include engineering designs or calculations use for air flow rates or volumes.
 - d. **Responses to 2.i.** We asked for information regarding equipment used to control, reduce or mitigate emissions of particulate matter, volatile organic compounds, oxides of nitrogen, carbon monoxide, and ammonia. The responsive document DOC # 0010 includes a standard operation procedure (SOP) for the sampling and hydrogen sulfide (H2S) and corrective actions for samples indicating noncompliance. The response seems insufficient in responding to the request. For the purpose of clarity, does Hickman have equipment used to control, reduce or mitigate emissions from the poultry houses, including equipment to control, reduce or mitigate the emission of H2S? What is the compliance plan used as a corrective action in the event there is a sample indicating noncompliance for H2S, as referenced to in DOC # 0010?
3. The following question pertains to Request 4
 - a. **Responses to 4.f.** We asked for equipment used to control, reduce or mitigate emissions of particulate matter, volatile organic compounds, oxides of nitrogen, carbon monoxide, and ammonia for thermal processing of chicken litter and/or manure at the Facilities^[1]. Hickman

responded with DOC # 0018, which indicates that two rotary dryers manufactured by Vulcan Systems (identified in DOC # 14 to in response to 4.c.) are used to control, reduce or mitigate emissions from thermal processing of chicken litter and/or manure. Do these dryers have any equipment to control emissions from the stack? Also, specify whether there are any additional equipment used to control, reduce or mitigate emissions (if any) from other sources identified under 4c in DOC # 0018, identified sources are identified below:

- i. California Pellet Mill Model 3020
- ii. California Pellet Mill Model 7000
- iii. Seattle Boiler
- iv. Engineered Systems & Equipment EX 10 Drying Oven

4. The following question pertains to Request 5.

- a. **Responses to 5.e.** We asked for the equipment used for manure turning, including number and purpose of each type of vehicle / device. Hickman provided DOC # 0018. Specify the number of equipment.
- b. **Responses to 5.f.** We asked for engineering designs or calculations used for air flow rates or volumes for the manure barns, manure windrows, manure turning, and related buildings and structures. Hickman responded with DOC # 0018, which provides emissions estimations for NO_x, CO, SO₂, TOCs, PM, and CO₂ for the rotary dryers manufactured by Vulcan Systems. Specify whether these are emissions from the engine from which the rotary dryer operates only. Does this include emissions from the rotary dryer's stack? Are there engineering designs or calculations used for air flow rates or volumes for the manure barns, for the manure windrows, and for the manure turning?
- c. **Responses to 5.g.** We asked for a description of practices used to control, reduce or mitigate emissions from manure barns, manure windrows, manure turning and manure handling operations. Hickman responded with DOC # 0018, under 5g. Clarify whether Hickman uses emissions controls for emissions of particulate matter, volatile organic compounds, oxides of nitrogen, carbon monoxide, and ammonia from the manure.

5. **This question pertains to Request 6.** We asked Hickman to provide total monthly production of compost / fertilizer for each month from January 2011 through May 2016 for each Facility. Hickman responded with DOC # 19. However, DOC #19 does not identify this information for each of the Facilities. Also, explain the formula used referencing the "Max Number of birds". Is the "Amount of Birds" based on the "Max Number" of birds the maximum capacity which the facility can hold, or is it the maximum number of birds which Hickman has actually housed?

6. **This question pertains to Request 8.** We asked for results of all source testing conducted at the Facilities for emission of particulate matter, volatile organic compounds, oxides of nitrogen, carbon monoxide, and ammonia. Hickman provided DOC # 30, which includes only Hickman's Hydrogen Sulfide SOP, Hickman's Light Density & Ammonia Level Verification Policy, and light and ammonia readings from the barns dated February 15, 2016. The response seems insufficient in responding to the request.

- a. Specify whether Hickman has any additional measurements from source testing from January 2011 through May 2016.
- b. In addition, based on your responses, EPA understands that ADEQ has required monthly monitoring measurements from the rotary dryer covered under the recent Arizona Agricultural Best Management Practices (Ag BMP) permit provided to Hickman. Provide all copies of those measurements.

7. **This question pertains to Request 12.** We asked whether Hickman believes that the Facilities are subject to the Ag BMP requirements, and to explain the legal and factual basis for this position. Hickman provided DOC # 21. EPA understands that there was an inspection conducted by ADEQ on June 13, 2016, and that the Ag BMP procedures were reviewed with Hickman staff, and an Ag BMP permit was provided to Hickman on the same day. Provide a map situating the Hickman facilities in

relation to the areas where the Ag BMP requirements apply under the Arizona SIP. In a narrative, explain the legal and factual basis for Hickman's coverage under the Ag BMP requirements.

These questions are related only to the 114 Request. At some point, I would also like to follow up with TRI related questions. I didn't want to make this message too complicated in mixing questions for both the 114 Request and TRI request.

Thank you,
Janice

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^[1] As defined in Enclosure 3 of the 114 Request dated June 1, 2016.